

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Lisa L. Brewer, Plaintiff, )  
v. ) No. 19-cv-04317  
PC Connection, Inc., *et al.* ) Judge Steven C. Seeger  
Defendants )

**BREWER'S RESPONSE TO DEFENDANTS' MOTION TO DISMISS  
COUNTS VIII, IX, X, XI, AND XII OF PLAINTIFF'S COMPLAINT**

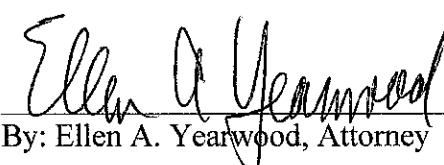
Defendants' Motion to Dismiss is directed against those counts of the Complaint which allege age discrimination in violation of the ADEA by individuals and is based entirely on case law that holds there is no individual liability under the ADEA. (There is a count for ADEA violation against PC Connection, Inc., which is not a subject of the Motion to Dismiss.)

After reviewing the cited cases in Defendants' Motion and noting they have not been overturned nor overruled but have instead been cited repeatedly for the same proposition, that is, that there is no individual liability under the ADEA, Plaintiff is not contesting Defendants' Motion and will not be amending her Complaint to add back those counts after Defendants' Motion is granted.

WHEREFORE, Plaintiff acknowledges that Defendants' Motion should be granted and that counts VIII, IX, X, XI, and XII of Plaintiff's complaint should be stricken.

Respectfully submitted,

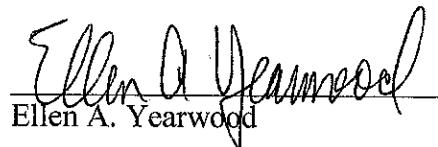
LISA BREWER

  
By: Ellen A. Yearwood, Attorney

## CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that she caused a copy of Brewer's Response to Defendants' Motion to Dismiss Counts VIII, IX, X, XI, and XII of Plaintiff's Complaint to be served upon the below named party by email on Dec. 3, 2019, and via service from electronic filing on the same date and that the required two copies were hand-delivered via Fed Ex to the drop box outside Room 1728 on Thursday, Dec. 5, 2019.

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